

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

2004 JUN 18 P 4:05

C.A.#04-10550-WGY

JACQUELINE LASSITER

U.S. DISTRICT COURT  
DISTRICT OF MASS.

PLAINTIFF'S INITIAL DISCLOSURES

v.

KIMBER ANDERSON ET AL.

The plaintiff makes the following Initial Disclosures, pursuant to FRCP 26(a)(1):

1. Witnesses:

The following persons are likely to have knowledge of discoverable information which the plaintiff may use to support her claims:

- a. The plaintiff;
- b. Kimber Anderson-15 Hazel St., Salem, Ma.01970; (978) 921-4266- Plaintiff believes that Ms.Anderson is aware of the discriminatory and retaliatory manner in which plaintiff was treated in the course of her employment.
- c. Brian Gibbs-710 Washington Street, Canton, Ma. Plaintiff believes that Mr.Gibbs is aware that the defendants subjected plaintiff to racial discrimination; retaliation and harassment in the course of her employment at Fleet.
- d. Plaintiff's husband-Mr.Lassiter-22 Frontenac St.,Dorchester, Ma.02124. Mr.Lassiter is aware that plaintiff suffered symptoms consistent with emotional distress and mental anguish during the course of and subsequent to her employment with Fleet.

Plaintiff reserves the right to supplement this list during the course of discovery, herein.

2. Documents:

The following categories of documents and things are in the plaintiff's possession and may be used by plaintiff to support her claims:

- a. Correspondence between the parties.
- b. Fleet's Employee Handbook.
- c. Documents submitted to MCAD and/or to the EEOC.

Plaintiff reserves the right to supplement this list during the course of discovery.

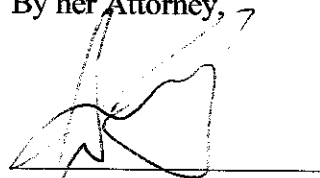
3. DAMAGES:

Plaintiff has in her possession the following which tend to show her damages:

- a. Resume
- b. Academic Background
- c. Income Tax Returns

Plaintiff reserves the right to supplement this list during the course of discovery.

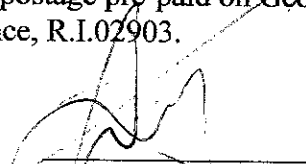
Plaintiff,  
By her Attorney, 7



W.Kendall  
136 Warren Street  
Roxbury, Ma.02119  
(617) 442-6130

CERTIFICATE OR SERVICE

I, W.Kendall, hereby certify that on 14<sup>th</sup> June, '04, I did make service of the foregoing Plaintiff's Initial Disclosures, by first class mail, postage pre-paid on George Kostakos, esq., Edwards, Angell, 2800 Financial Plaza, Providence, R.I.02903.



W.Kendall